

## Affidavit of Viren Gandhi, Mechanical Engineer

I, **Viren Gandhi**, of **#48-3205 Uplands Drive, Ottawa, Ontario, K1V9T3**, MAKE OATH AND SAY AS FOLLOWS:

1. On **December 26, 2024**, I was contacted by Jane Scharf after her vehicle, a **Matrix Nexa**, experienced severe performance issues and left her stranded on the side of the road. Upon arrival, I conducted a test drive and personally observed the following issues:
  - a) The **driver's side door was visibly misaligned and produced loud banging and rattling noises** during operation.
  - b) The vehicle's **performance significantly declined within 2 km of driving**, dropping from the expected speed to approximately **10 km/h**, after which a **battery warning appeared**.
  - c) The vehicle experienced **rapid battery drainage**, significantly reducing its usability. The vehicle appeared to regain some function **only after a cooling period**, indicating a potential issue with the **battery cooling system or power controller**.
2. As a **Mechanical Engineer**, I have reviewed **current research on lithium-ion battery risks**, particularly in electric vehicles, which indicates **significant fire hazards related to overheating, rapid discharge, and battery defects**. Based on my professional knowledge and the observed performance issues, I am concerned that the Matrix Nexa's **battery system may pose a serious safety risk**.
3. Research on **lithium-ion battery safety risks** documents multiple instances of **thermal runaway leading to fires or explosions**. The following sources highlight these risks:
  - o **National Fire Protection Association (NFPA) Study on EV Battery Fires:**  
<https://tc.canada.ca/en/dangerous-goods/publications/lithium-battery-transport-research>
  - o **Transport Canada Report on Lithium Battery Safety:**<https://tc.canada.ca/en/dangerous-goods/publications/lithium-battery-transport-research>
  - o **Scientific American Article on EV Battery Failures:**  
<https://www.scientificamerican.com/article/ev-batteries-are-dangerous-to-repair-heres-why-mechanics-are-doing-so-anyway/>
  - o **National Fire Prevention Association**  
[https://www.nfpa.org/education-and-research/home-fire-safety/lithium-ion-batteries?utm\\_source=chatgpt.com](https://www.nfpa.org/education-and-research/home-fire-safety/lithium-ion-batteries?utm_source=chatgpt.com)
  - o **Fire Safety Research Institute**
    1. [https://fsri.org/research-update/journal-article-investigates-explosion-hazards-lithium-ion-battery-thermal-runaway?utm\\_source=chatgpt.com](https://fsri.org/research-update/journal-article-investigates-explosion-hazards-lithium-ion-battery-thermal-runaway?utm_source=chatgpt.com)
    2. [https://fsri.org/research-update/fsri-releases-introductory-guide-lithium-ion-battery-fire-and-explosion-hazards?utm\\_source=chatgpt.com](https://fsri.org/research-update/fsri-releases-introductory-guide-lithium-ion-battery-fire-and-explosion-hazards?utm_source=chatgpt.com)

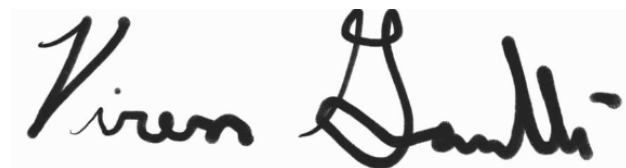
- 2025, February 13, Ottawa e-bikes catching on fire inside homes  
<https://www.ctvnews.ca/ottawa/article/e-bike-fire-on-bronson-avenue-displaces-2-people/>
- 2024 CBC report on Montreal ship container fire: “Lithium battery fires emit hazardous pollutants like hydrogen fluoride and small particles that can penetrate the lungs...Acute exposure can even lead to a risk of heart attack or stroke..”  
<https://www.cbc.ca/news/canada/montreal/montreal-lithium-battery-fire-concerns-1.7336652>
- 2024 UK article on increase lithium-ion battery fires which burn differently and cause more harm - <https://www.britsafe.org/safety-management/2024/fires-caused-by-lithium-ion-batteries-up-46-last-year>
- 2023 CBC report on Sheppard-Yonge subway fire - <https://www.cbc.ca/player/play/video/1.7073074>

4. Given the **persistent defects, rapid battery depletion, and potential fire hazard**, I strongly recommend that this complaint be formally investigated by **Consumer Protection Ontario** and relevant safety regulators.

I make this affidavit in **good faith**, believing it to be **true and accurate** to the best of my knowledge and experience.

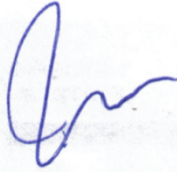
Video Conference

Complete if deponent and commissioner are not in same city or town:  
by Verin Gandhi of the municipality of Val-des-Monts, Quebec in the Country of Canada before me at the city Ottawa, Ontario in the Country of Canada on February 25, 2025 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely:



.....Deponent

**SWORN BEFORE ME** at the City of Ottawa in the Province of Ontario,  
this 25 day of February, 2025.



Jane Scharf  
Licensed Paralegal  
#P06406

..... Commissioner for Taking Affidavits